CODE OF CONDUCT AND BUSINESS ETHICS

TRUEBLUE, INC.
A MESSAGE FROM PATRICK BEHARELLE

TrueBlue enjoys a positive reputation in the industry because of our commitment to our core values and the highest standards of ethical behavior. These commitments will not be compromised, under any circumstance, by our aspirations to grow. Ethics and compliance form the foundation of our business activities and are at the forefront of every business decision we make and every action we take.

Each of us is accountable for upholding our commitment to our ethical standards, which requires more than following laws and regulations. It’s living our core values. It’s being kind, fair and honest – it’s doing the right thing.

Our Code of Conduct and Business Ethics describes the expectations set for your behavior, from our commitment to treat each other kindly to our zero tolerance for fraud, bribery or corruption. It reflects who we are, how we work and is based on our core values and the law.

The reputation of TrueBlue, and the trust and confidence of our stakeholders, is crucial to the continued success of our business. We ask that you carefully read our Code. Take some time to think about what it says, and make a commitment to follow it and refer to it often for guidance.

Patrick Beharelle, President and
Chief Operating Officer
ABOUT OUR COMPANY

It all started with a mission to put people to work. In 1989, TrueBlue opened its first office in Kent, Washington with a strong focus on blue-collar work. We continue to grow stronger through the diversification of service offerings and expansion of our reach in the global marketplace. We are the talent solution for the changing world of work, and we got here by modeling our core values day in and day out, committing to the highest standards of ethics and integrity, and staying true to our mission - connecting people and work.

OUR PURPOSE

Connecting people and work.

OUR VISION

To be the talent solution for the changing world of work.

OUR VALUES

Be Accountable: We empower our people to take personal responsibility and have an impact.

Be Optimistic: We believe there is a solution to every problem. We are innovative, discovering new ways to get results.

Be Passionate: We are passionately committed to doing good and will go above and beyond.

Be Respectful: We listen and learn from each other and embrace our diverse views and experiences.

Be True: We are true to who we are and what our clients need.
At TrueBlue, we are committed to our core values and to operating as an ethically responsible and trustworthy company. We have formed and enjoy a positive reputation in the industry. Our shareholders, clients, employees and others who work with, for, or on behalf of us, rely on us to do the right thing, and this is a responsibility we proudly embrace. A big part of doing the right thing is ensuring that we follow all laws and regulations that apply to our business.

To protect our reputation and to commit to our core values, we have an Ethics and Compliance Program ("Program"). Integral to our Program is the Code of Conduct and Business Ethics ("Code"). The Code is a statement of the principles and expectations that guide our ethical business conduct. It serves as the framework to help us understand our core values and to resolve the ethical and compliance issues we may face on a day-to-day basis. It applies to the members of the Board of Directors and to officers and all other employees ("Employees") who work for TrueBlue and its affiliates worldwide ("Company"). The Code must at all times guide our conduct with our clients, candidates, shareholders, other Employees and temporary associates (collectively "Key Stakeholders"), as well as our agents, consultants, independent contractors, suppliers, vendors and other intermediaries (collectively "Third Parties").

Many of the subjects described herein are covered in more detail in respective Company policies, processes, standard operating procedures and guidelines (collectively "Policies"). Each of us commit to reading, understanding and following the Code, Policies, and applicable laws and regulations, while promoting our core values. If we fail to meet this commitment, not only do we put our reputation at risk, we expose ourselves and TrueBlue to civil and criminal exposure, fines, penalties and damages.
COMMITMENTS TO THE CODE

Call to the hotline and website can be anonymous, but we do need sufficient detail about your concern to adequately investigate and take action. To the extent reasonably practical, we make an effort to maintain confidentiality. Sharing of information is only with those who investigate or respond to an allegation, or as otherwise required by law. Refer to the Resource section in the Code for guidance when reporting concerns outside the United States.

Stand Up and Speak
The door is always open.

We value and encourage open and honest discussion, which is why our Stand Up and Speak philosophy is a critical part of our culture. You should feel comfortable and safe speaking your mind, seeking guidance and reporting concerns.

Seek Guidance
When in doubt, reach out.

While it is not possible to have a specific rule for every dilemma we may encounter, our values, the Code and our Policies will provide you with the direction you need. If you are unsure of whether an action or behavior is in conflict with Company standards, seek clarification.
Report Concerns
Stand up and speak when you suspect, or are aware of, unethical conduct happening in the workplace.

Maintaining ethical standards is the responsibility and obligation of every Employee. Early identification and resolution of ethical issues that may arise is critical to maintaining our commitments to Key Stakeholders, Third Parties, regulators and the communities in which we live and work. If you observe, or even suspect, a violation of the Code, you must report it promptly to any of the following reporting resources:

- Human Resources
- Chief Human Resources Officer
- Chief Ethics and Compliance Officer
- General Counsel
- Compliance Alert hotline at www.truebluecompliancealert.com or by phone in the United States and Canada at 855-70-ALERT. International callers should check the ComplianceAlert website for country specific dialing instructions.

During a break, I observed questionable behavior between colleagues. Do I need to report it?

- Does the conduct appear dishonest, unethical, or unlawful?
- Is the conduct inconsistent with the Code or Policies?
- Does the conduct hurt our Company’s reputation?
- Does the conduct hurt Key Stakeholders?

If you answer yes, or even maybe, to any of these questions you may have seen behavior that violates the Code and that should be reported.
Do Not Retaliate
Retaliation, or detriment, annihilates trust and destroys ethical cultures.

We do not tolerate retaliation or detrimental action against anyone who raises a concern in good faith. Retaliation in any form against any individual who, in good faith, reports a suspected violation of the Code, even if it turns out there was no actual violation, or against any individual who assists in the investigation of a suspected violation, is a violation of the Code. Retaliation is a serious act of unethical conduct and is strictly prohibited. Anyone who retaliates is subject to disciplinary action, up to termination of employment.

What should I do if I suspect a colleague is being dishonest or not forthcoming during an investigation?

Misrepresentation or misleading by a Company Employee during an investigation is a violation of the Code. If it is happening, you must report it immediately.

Respond to Investigations
Take action and be honest.

We take all reports of suspected violations and unethical behavior seriously, and we take swift steps to remedy the situation. We need, and expect, you to share this same commitment by cooperating in the investigation of suspected unethical behavior or violations of the law, our Code and Policies.
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Why should I report a colleague’s unethical conduct if it does not impact me?

It may seem easier to keep quiet, but unethical conduct, at any level, hurts TrueBlue. Failure to report a violation of the Code is also a violation.

Manager Responsibilities

Through words and actions, managers and supervisors model the way and promote a culture of ethics and compliance. Managers have special responsibilities in not only following the law themselves, but ensuring those who work for them are also following the law.

Be aware that as a manager, your actions could influence others to conduct themselves contrary to our ethical standards. Make it a priority to foster a work environment that encourages others to model our values and follow the law. It is equally important to encourage Employees to raise concerns and to protect them from retaliation.
COMMITMENTS TO THE COMPANY

AVOIDING CONFLICTS OF INTEREST

Our business decisions must always serve our Company's interest.

You should avoid actual or potential conflicts of interest. A conflict of interest occurs when your private interest interferes in any way - or even appears to interfere - with TrueBlue’s interests. A conflict of interest can arise if you take actions or have interests or relationships that may make it difficult to perform your work objectively and effectively.

To avoid conflicts of interest, you should refrain from making employment decisions, including hiring, promotion, pay or termination, in regard to anyone who is a close friend, household member, relative, domestic partner, relative of domestic partner, current and former romantic partner or their relative.

You should also avoid business relationships with any individual or company that could create the appearance of impropriety or interfere with your ability to perform your work responsibilities.

If an Employee (other than a Director) believes that an Employee is, or may become, involved in a potential conflict of interest, the Employee must discuss it with, and seek a determination and prior
authorization or approval from, the Chief Ethics and Compliance Officer or General Counsel. If a Director believes a situation exists in which the Director has a conflict of interest that would interfere with the ability to perform the Director’s responsibilities, the Director must promptly notify the Board of Directors’ Audit Committee Chair (or in the case of the Audit Committee Chair, the Chief Ethics and Compliance Officer or General Counsel).

When a potential conflict is reported, the Chief Ethics and Compliance Officer, General Counsel or Audit Committee Chair, as applicable, each acting where appropriate on the advice and guidance of counsel, will review all relevant facts to determine whether the facts may represent a conflict or a potential conflict. Then, they will determine how the matter can be managed or resolved and may (i) conclude that the conflict or situation does not amount to a conflict of interest, (ii) provide guidance to avoid a conflict from developing (such as suggesting recusal from consideration and/or approval of specific matters that come before the Board) or (iii) declare that the Employee or Director may not pursue a certain course of action or must terminate the conflict.

Failure to make required disclosures or resolve conflicts of interest satisfactorily can result in discipline up to and including termination of employment.
Accepting and Giving Gifts and Entertainment:
Accepting and giving gifts must never influence, or appear to influence, decisions we make on behalf of TrueBlue.

When limited gifts, entertainment or other things of value ("Gifts") are exchanged, it can create goodwill and enhance business relationships, provided we remain objective in our selection of and dealings with Key Stakeholders and Third Parties. You must avoid offering, promising, authorizing, giving or accepting, directly or indirectly, anything of value, when it can create the perception that the Gift has or will improperly influence a business decision. Use caution and common sense any time you accept and give Gifts, payments or services from those you seek to do business with or who seek to do business with you. Do not accept or give gifts to persons representing or working for any government. Employees should seek guidance when in doubt as to whether a Gift or expenditure is appropriate.

Accepting Gifts
You must not accept or solicit from any Key Stakeholder or Third Party, any Gift intended to, or which might appear to, influence your decisions or which would cause you to feel any obligation to the giver. In no event should you accept any Gift worth more than USD/GBP/EUR 100, AUD/NZD 150, and 3500 INR without receiving your up-line Vice President’s ("VP") pre-approval. If your position is equal to or greater than VP, you must obtain prior authorization from the Chief Ethics and Compliance Officer or General Counsel.

As a token of appreciation for our business, a vendor offered me two World Cup tickets. Can I accept them? If not, what is the criteria to accept or give Gifts and entertainment?

No. The value of a World Cup ticket is considered an extravagant and excessive Gift and therefore may not be accepted.

Remember, a Gift is anything of value, including, but not limited to, meals, lodging, loans, cash, favorable terms or discounts on services, transportation, vacation or other facilities, stocks or other securities, home improvements, gift cards, memberships and event tickets. The potential list is endless; these are just examples.
Giving Gifts
When giving occasional Gifts to Key Stakeholders, Third Parties or others with whom we have or seek to have a business relationship, you should ensure that such Gifts are reasonable, approved, properly documented and in line with customary business practices. You should avoid giving Gifts where the acceptance of the Gifts could violate the law, a Policy or create the appearance of impropriety. Do not give gifts to government officials and use extreme caution because even an offer to purchase a meal may be prohibited. Never offer, promise or give a Gift or advantage to anyone to influence them to act improperly in their official capacity. Please refer to the Code’s Anti-Corruption section and related Policy for additional guidance.

Gifts, business entertainment or any token of appreciation must:

- Represent legitimate Company activity;
- Be reasonable, proportionate and not extravagant or excessive;
- Be infrequent;
- Be in good taste and never harm our Company’s reputation;
- Never be in the form of cash or cash equivalents (i.e., gift cards or gift certificates);
- Never create the appearance (or an implied obligation) that the recipient or giver is entitled to preferential treatment;
- Never include hidden fees for a service, act, omission, certain decision on transaction, agreement, license, permit, etc.;
- Never attempt to influence the recipient or giver to partake in any illegal or unethical activity;
- Never be received or given to secure an improper advantage;
- Be reviewed and approved by your VP when the token is a travel offer;
- Never cause inappropriate influence or conflict with the principles and requirements of Company Policies, the Code and applicable local and international law;
- Be pre-approved by your VP when the Gift value exceeds USD/GBP/ EUR 100, AUD/NZD 150, and 3,500 INR. Obtain pre-approval from the Chief Ethics and Compliance Officer if your position is equal to or greater than VP, and;
- Be pre-approved by the Chief Ethics and Compliance Officer or General Counsel when the cumulative annual value of all gifts received from one or multiple givers, in the aggregate, exceeds USD/GBP/EUR 500, AUD/NZD 750, and 17,500 INR.
B. Outside Opportunities: Activities outside of work should never conflict or appear to conflict with our TrueBlue responsibilities.

Employees may have opportunities to run their own businesses, work for other employers, or volunteer in other organizations. You should avoid any outside employment or other opportunity which interferes with your work performance at our Company or creates a conflict of interest. Also, any outside employment or other opportunity which directly competes with our Company is prohibited, both while you are an Employee and after employment with our Company, subject to the terms of any applicable non-competitive agreement. You must obtain approval from your supervisor before accepting outside employment.

Many situations may create conflicts of interest, such as when:

- A relative or friend reports to a supervisor who may affect their job responsibilities, pay and promotions.
- An Employee hires a relative to provide services at a TrueBlue office.
- An Employee starts a company providing services similar to TrueBlue.
- An Employee provides paid consulting services on the weekend to a client.
- A TrueBlue executive or a member of the Board of Directors accepts fees or provides advice to a company in competition with TrueBlue.
- A manager dates an employee who reports to him or her.
- An Employee owns or holds a financial interest in a client, competitor or Third Party.
- An Employee accepts a vendor’s gift, then recommends the purchase of the vendor’s products without comparing them to another vendor’s comparable products.
- An Employee uses Company assets, intellectual property or confidential or proprietary information for personal gain.
- A hiring manager does not disclose a close personal relationship with a potential vendor.

Avoid any outside activity:

- That conflicts with your work schedule.
- That hinders sound business decisions.
- That involves Key Stakeholders or Third Parties.
- Using Company resources to promote the activity or for personal gain.
- That would cause our Company embarrassment.

Knowing whether an outside activity may create a conflict of interest can be complex. Always seek guidance when in doubt.
PROTECTING COMPANY INFORMATION, ASSETS AND REPUTATION

Each of us is responsible for protecting confidential information, assets, property, facilities and intangibles, like our brand and reputation.

A. Confidentiality:
We maintain the confidentiality of information entrusted to us.

From time to time, you may be exposed to confidential information. It is your duty to maintain the confidentiality of information entrusted to you except when disclosure is authorized or legally mandated. Examples of confidential and proprietary information include: our strategic plans, programs and methodologies and similar information; our financial information that has not been released to the public: revenues, margins, bill rates, pay rates, expenses and profits; client information, such as client and prospect lists, client service preferences, agreements or requirements; contracts; our computer systems and data, including login credentials and personal passwords; and personally identifiable information (“PII”) such as social security number, identification number, date of birth, home or email addresses.

All Company intellectual and digital property, materials, products, designs, plans, ideas and data should be used only for Company business, and should never be given to an outside firm or individual without the authorization of your up-line VP and a signed confidentiality agreement approved by the Legal Department. Information about our computer systems and data, including login credentials and personal passwords, are also confidential.

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I received a request from the local Chamber of Commerce to present an overview of my top two clients, including average weekly billing, payment history and growth expectations. Can I share those details?

No. You must never share a client’s financial information; it is confidential.
B. Safeguarding Assets:
We safeguard assets, property, records and facilities.

You are responsible for protecting our Company’s assets, records, property and facilities ("Assets") issued to you or in your control. This includes properly securing and destroying records according to record retention rules and Policy. You should use and maintain Assets responsibly, efficiently and appropriately, and only when conducting legitimate business or reasonable personal use. Engaging in harmful, unlawful and unethical conduct through the use of a Company Asset is strictly prohibited and a violation of the Code. Your work email, voicemail and Internet access systems are for work purposes and TrueBlue reserves the right to access them, at any time, with or without advance notice or consent.

C. Information Privacy and Security:
We protect sensitive data.

The nature of our services requires us to handle sensitive data, including PII. We have adopted a variety of security controls to protect PII. Access, transfer and release PII only in accordance with our Policies and applicable privacy laws. You should never use an individual’s PII for personal benefit or for non-business use.

Data privacy is an individual’s right to keep aspects of personal information private. To respect and honor privacy rights, our Company manages personal information appropriately, including its collection, use, storage, disclosure and destruction.

Personal information is information specific to an individual. It may include home and email address, telephone number, social security and other government ID numbers, biometric information, date of birth, financial information such as a bank routing number, health and medical information and employment-related data such as salary history and performance evaluations.
D. Fraud, Theft and Dishonesty:

*We are truthful, trustworthy and honest.*

We are committed to taking all reasonable and appropriate steps to prevent acts of theft and fraud. Misappropriating or embezzling funds, failure to return property or data belonging or entrusted to TrueBlue or others is strictly prohibited. We have a zero-tolerance policy for acts of fraud, theft, dishonesty, embezzlement, misappropriation, falsification of records or similar acts. Such acts are illegal and will be prosecuted.

E. Company Communication:

*When we speak on behalf of TrueBlue, we speak with one voice, with a consistent message and through the appropriate authority.*

Corporate Communications has the primary responsibility for speaking to the outside world on behalf of TrueBlue and managing our public reputation. This includes providing information to, and interacting with, the media in regard to Company business. Only a Company designated spokesperson may speak to the media. Media inquiries, such as those from national broadcasters, local television and radio stations, newspapers, digital media such as websites and blogs and similar organizations, must be immediately forwarded to Corporate Communications to determine the appropriate response.
Social Media:
*We use good judgement.*

We understand that social media can be a fun and rewarding way to share your life and opinions with family, friends and co-workers around the world. However, use of social media also presents certain risks and carries with it certain responsibilities. Ultimately, you are solely responsible for what you post online. Be sure to be respectful, honest and accurate in your online postings and do not disclose any confidential Company information. Conduct that adversely affects your job performance, your colleagues, or otherwise adversely impacts Key Stakeholders and Third Parties may result in disciplinary action up to and including, termination.

COMPLIANCE WITH LAWS
*Doing the right thing, wherever we work.*

No matter where we conduct our work, following the laws in the countries where we do business is not only required but critical to our success. Failure to abide by laws can hurt our reputation, spur government investigations and subject us to litigation. If you have questions about an applicable law, please contact the Legal Department for clarification.

The following sections highlight some of the more important laws applicable to our Company’s operations.
ACCOUNTING AND RECORDKEEPING
*Our financial and other business records must be complete, accurate and properly reflect our Company’s operations and activities.*

It is our policy to fully and fairly disclose TrueBlue’s financial condition in compliance with applicable legal and accounting principles, laws, rules and regulations. Many Employees, not just accountants and controllers, participate in our Company’s financial controls and reporting processes. If you have any responsibility for any aspect of our Company’s recordkeeping and/or preparation of our Company’s financial statements or other reports, you must ensure that complete and accurate books and records are maintained.

All accounting records and financial reports produced from those records must be kept and presented in accordance with applicable law, must accurately and fairly reflect in reasonable detail our Company’s Assets, liabilities, revenues and expenses, and must be in accordance with Generally Accepted Accounting Principles (“GAAP”). If you receive inquiries from our Company’s internal accountants or auditors or its independent auditor, you must respond promptly, fully and accurately. If you suspect a violation regarding accounting, financial reporting or auditing matters, you are required to contact our Company’s Chief Ethics and Compliance Officer, General Counsel or Board of Directors’ Audit Committee Chair. Any notice of such suspected violation received by our Company will be forwarded to the Audit Committee.
ANTI-BRIBERY AND CORRUPTION
We comply with anti-bribery and corruption laws.

TrueBlue strictly prohibits all forms of bribery and corruption. Employees, Key Stakeholders and Third Parties working on our Company’s behalf are prohibited from requesting, accepting, offering, paying or giving anything of value to or from any government official, or anyone else, with the intent to improperly influence, or be influenced, into making a decision or affecting a business outcome. You are obligated to keep books, records and accounts that accurately and fairly reflect all transactions and dispositions of Company Assets, and that abide by applicable laws and Policies. We expect Third Parties to conduct business ethically and in accordance with all applicable laws and regulations.

What types of payments are perceived as valuable and may violate the law?
- Cash bribes and kickbacks
- Excessive and improperly documented Gifts
- Travel, lodging, entertainment, gift cards
- Loans or transactions to/from relatives or friends
- Charitable donations
- Facilitating or expediting payments

Remember, giving or taking anything of value for improper purposes is prohibited.

Watch out for these risk indicators when working with Third Parties.
- You have reason to believe that the Third Party is, or is related to, a government official.
- The country has a reputation for corruption and bribery.
- The Third Party requests unreasonably high or unsupported fees.
- The payment method is unusual, such as small cash increments, or made to offshore accounts.
- The invoicing is complex or incomplete.

If any of these factors exist, use caution. Review our Anti-Corruption Policy, discuss your concerns with your manager or contact the Chief Ethics and Compliance Officer or General Counsel.
ANTI-TRUST
*We firmly commit to competing fairly and ethically in the marketplace.*

TrueBlue seeks to compete vigorously and fairly. We maintain and grow our business through superior services, not through improper or unethical business practices. Working honestly and without unfair business advantages reinforces our commitment to anti-trust laws, also known as anti-competition or monopoly laws. When dealing with competitors, you should never enter into any agreement, whether formal or informal, written or verbal, to set prices or other terms of sale, including profits or margins, coordinate recruitment strategies or Employee salaries, allocate clients, sales territories, or engage in any other activity that violates applicable antitrust or competition laws. You should never discuss such topics with a competitor, even in an informal setting such as a trade show or customer event.
INSIDER TRADING

We do not use or share material non-public information for trading (the purchase or sale) of Company stock.

Insider trading is illegal. Generally, insider trading occurs when Employees and/or their family members trade TrueBlue securities, while having knowledge of material, non-public information. Material means there is a substantial likelihood that a reasonable investor would consider the information important in deciding whether to buy or sell stock, and non-public means the general public has not been made aware of the information. Chances are, if a person learns something that leads that person to want to buy or sell stock, the information will be considered material. Some examples of material information include: annual or quarterly financial results, a change in earnings projections, unexpected or unusual gains or losses in major operations, significant changes in prices, customers or suppliers, major developments in litigation or regulatory matters and significant management changes.

Examples of activities that may be perceived as insider trading and are prohibited include:

- Providing material, non-public information to family members, friends, former co-workers or other acquaintances (“tipping”)
- Trading Company stock in violation of any applicable blackout period restrictions
- Assisting someone engaged in either activity
WAGE AND HOUR LAWS
We pay accurate wages in accordance with applicable laws.

Our Company is in the business of employing people, and as a Company we are committed to paying our employees accurately in accordance with all applicable laws.

Managers in all U.S. based locations\(^1\) - It is your duty to know and abide by wage and hour laws\(^2\) that affect our Employees. You are responsible for ensuring Employees are paid for all hours worked. This includes properly paying non-exempt hourly Employees for overtime compensation and for time spent working before and after work shifts and during required meetings and training. It is illegal, and a violation of the Code, to falsely report hours worked on behalf of TrueBlue.

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**Q.**

**My hourly employee worked overtime without authorization. Is the employee entitled to overtime pay even though she did not receive permission to work the additional time?**

Yes. Pay hourly employees for all time worked including unapproved overtime hours. Then, contact HR to address the conduct through the proper human resources performance process. Never discipline employees through wages.

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\(^1\) Outside the U.S. managers and Employees are required to follow applicable local minimum wage laws.

\(^2\) “Wage and hour laws” and “exempt/non-exempt” status refer to the minimum hourly wage and overtime pay standards, and exemptions thereeto, set by the federal Fair Labor Standards Act (FLSA) and enforced by the U.S. Department of Labor.
Non-Exempt Hourly Employees - It is your responsibility to follow applicable wage-related laws and Policies and remember to:

- Never work without pay or remove correctly recorded hours from a record.
- Never record a colleague’s time or ask them to record your time.
- Always record overtime, whether approved or unapproved, and record time accurately and in the pay period when it occurs.

I need 30 minutes to finish my work. Can I clock out then continue working?

No. If you are an hourly paid employee, report all time worked whether authorized or unauthorized. Also take all meal and rest periods required by law and Policy.

EMPLOYMENT VERIFICATION
We comply with the laws governing verification of employment and eligibility to work.

Those who are responsible for the recruitment and onboarding of Employees should know and comply with the laws and Policies governing verification of employment and eligibility to work. It is illegal, and a violation of the Code, to knowingly hire and employ any person who you know to be ineligible to work.
We are committed to creating an irresistible organization — one that engages and inspires our Employees and associates to work for us and our clients to do business with us. Each of us, through our words and actions, create our Company culture. We have a responsibility to enhance engagement and loyalty by treating each other with respect and kindness in all of our interactions. We are committed to diversity and inclusion, and a workplace free of discrimination, harassment and violence.
DIVERSITY AND INCLUSION

We commit to fostering a culture of diversity and inclusion.

We value the richness that comes from having a diverse and inclusive workforce. Diversity provides a broader range of perspectives and capabilities and represents an advantage to our Company. We foster a diverse and inclusive culture, where every Employee has an opportunity to contribute and grow while meeting the changing needs of the marketplace. We are committed to seeking the best talent and retaining a workforce that broadly reflects our communities and the communities we serve. We hire, retain and promote on individual merits and qualifications. These actions may never be taken on a discriminatory basis: such as being based on (but not limited to) race, color, religion, creed, national origin, citizenship, gender, age, marital and family status, sexual orientation, gender identity and expression, genetic information, ancestry, disability, veteran and military status or any other protected ground under applicable laws, regulations and Policy.
ANTI-HARASSMENT AND DISCRIMINATION

We have a responsibility to ensure and maintain a workplace free from discrimination, harassment and retaliation.

Our Employees are our most important asset and deserve respect and to be treated fairly and equitably. Acts of harassment, discrimination or retaliation are not only illegal, but contribute to poor morale and negatively impact our business. We strive to maintain a work environment free from discrimination, bullying, harassment and intimidation because of race, color, religion, creed, national origin, citizenship, gender, age, marital and family status, sexual orientation, gender identity and expression, genetic information, ancestry, disability, veteran and military status or any other protected group under applicable laws, regulation and Policy.

Actions constituting harassment, discrimination or retaliation are strictly prohibited, no matter where they occur. You are personally responsible for ensuring that your conduct meets this Policy. You have a duty to prevent harassment, discrimination, or retaliation and to report it if it occurs.

Managers have a special duty to create an environment of respect which is free from all forms of harassment. Managers have a legal obligation to take complaints of harassment and discrimination seriously. Managers must work with Human Resources to investigate and respond appropriately to such complaints.
What types of conduct may be considered sexual harassment?

- Unwanted/unwelcome sexual conduct, comments, advances, flirtations or propositions
- Verbal abuse of a sexual nature, including jokes or comments regarding one’s sexual attractiveness or activities
- Displays of sexually suggestive objects, pictures or gestures

These behaviors are unacceptable at TrueBlue. Report harassment immediately.

EMPLOYEE HEALTH AND SAFETY
We establish and maintain a safe work environment.

We believe that no job is so important and no service is so urgent, that we cannot take the time to ensure work is performed as safely as possible. If accidents do occur, we are committed to helping our injured Employees return expeditiously to productive work. TrueBlue has adopted safety programs and Policies that establish guidelines for each of us to ensure a safe and healthy workplace. You must commit to the success of our safety program and be responsible for creating a climate in which we share safety concerns. It is a violation of the Code, Policies and applicable laws to discourage others from reporting an injury or making a claim for workers’ compensation\(^1\). It is prohibited to retaliate against any individual who reports a job-related injury.

\(^1\) Where such relief is available under local law.
ANTI-SUBSTANCE ABUSE IN THE WORKPLACE

We promote a safe environment free from substance abuse.

Our Employees deserve to conduct business in safe, professional and productive workspaces. To ensure the safety of others, you should not perform your work while under the influence of any substance, either on Company premises or at a client or Third Party location, while attending work-related events or any other instance while working for or representing TrueBlue. This includes alcohol, illegal drugs and prescription medications, either improperly used or that impair your ability to work safely. No one may possess, use, sell, offer or distribute illegal drugs or other controlled substances on Company property.
ANTI-VIOLENCE IN THE WORKPLACE

We have zero tolerance for behavior that poses a direct threat to the health and safety of others.

TrueBlue fosters a workplace that is safe and free from physical intimidations, threats of violence, physical abuse and weapons of any kind. Appropriate and swift action is taken to address and stop workplace violence if it should occur. Subject to applicable laws and regulations, Employee possession of firearms is prohibited on Company premises or while conducting Company business. If you become aware of or suspect incidents and threats of workplace violence, immediately report your concerns.
COMMITMENTS TO OUR COMMUNITIES

HUMAN RIGHTS
We want to play our part in creating a better life for the people and communities touched by our business. From our colleagues, clients and suppliers, to the candidates and temporary associates that we connect to work – we always strive to promote equality, diversity and respect for human rights in everything we do. Our commitment to human rights is embedded in the culture and values that define our Company. They are reflected in our Policies and actions toward our Employees, Key Stakeholders, Third Parties and the communities and countries where we do business. We strive to create an environment of respect for all individuals. We do not tolerate human trafficking or forced or child labor in any form.

SOCIAL RESPONSIBILITY
We touch the lives of hundreds of thousands of people each year and understand the impact we have on our workforce and the communities in which we operate. We encourage our Employees to support the particular needs of our neighbors by, where possible and appropriate, contributing to local charities and participating in community initiatives.
POLITICAL PARTICIPATION

We encourage our Employees to participate in our political system by voting and becoming active in civic and political activities. However, except as specifically permitted by law and expressly authorized by Company Policy, the Chief Ethics and Compliance Officer or General Counsel, Employees should not give any direct or indirect contributions, services or other property on behalf of TrueBlue to any candidate for public office, or to any political party or other political organization. It is a violation of the Code to exercise, or attempt to exercise, improper influence on the government of any country in order to produce an outcome favorable to our Company.

Through volunteering and networking in our communities, TrueBlue helps prepare the workforce for the future by building community relationships and supporting volunteerism and the non-profit organizations that are integral to developing the workforce.

LOBBYING

Through TrueBlue’s Government Affairs team, we engage in lobbying activities on issues impacting our Company. Due to stringent reporting requirements around lobbying in the U.S., the TrueBlue Government Affairs team leads these activities on behalf of TrueBlue.
RESOURCES
Translations: In addition to English, the Code is published in the following languages: French Canadian, Polish and Spanish.

Applicable Audience: The Code applies to the TrueBlue Board of Directors and all Employees.

Accessing the Code: Our Company encourages Employees to access the internal TrueBlue Ethics and Compliance intranet site for the most up-to-date version of the Code at https://www.1strongteam.com/Legal-Compliance. Our Company also maintains a current version of the Code on the external TrueBlue website at http://www.trueblue.com/code-of-ethics.

Accessing Company Policies: For the most current versions of Company Policies, Employees are directed to visit My Company Policies on the TrueBlue Ethics and Compliance resource site at https://www.1strongteam.com/My-Company-Policies. Policies are subject to change without prior notice.

Review Process: The Code is periodically reviewed to determine whether revisions may be required due to changes in the law or regulations, our business or the business environment. The Chief Ethics and Compliance Officer, and depending on the change, General Counsel and the Board of Directors, must approve changes to the Code.

Disclaimer: The information contained in the Code is not a contract or an offer of a contract. The terms of the Code concerning the employment relationship are implemented at the sole discretion of TrueBlue and may be withdrawn or changed at any time, with or without notice.

WAIVERS: Any waiver of the Code for executive officers or directors of TrueBlue, Inc., may only be granted by the Board of Directors (or a committee thereof) and may be publicly disclosed if required by applicable laws, rules or regulations. Generally, TrueBlue does not grant waivers of the Code.

ComplianceAlert Exceptions:
In France, Portugal and Spain, ComplianceAlert may only be used to report issues relating to internal controls in these areas: accounting, banking or finance, or relating to competition or anti-corruption. For concerns outside of these five areas, report your concern to your local management, Legal or Human Resources team. Your privacy will be maintained in accordance with applicable European Union data protection laws. You must identify yourself when reporting a concern to ComplianceAlert and you are encouraged to present all details relating to your concern.

In the U.K. and Europe, you are strongly encouraged to identify yourself when reporting a concern through ComplianceAlert. Your privacy will be maintained in accordance with applicable European Union data protection laws. Whenever reporting a concern, you are encouraged to present all details relating to your concern. The ComplianceAlert hotline is not intended to be a general complaint line or a place for reporting operational issues. It supplements the UK’s normal grievance procedure and is another option for Employees wishing to report violations of the Code of Conduct or other concerns.